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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LLOYD RAHN,

Plaintiff

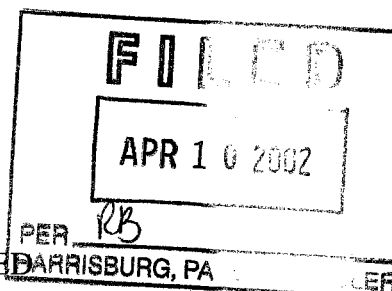
v.

BRODERSON MANUFACTURING
CORPORATION and CARSON
CRANE, INC.,

Defendants

NO. 1:01-CV-033
JUDGE YVETTE KANE

CIVIL ACTION - LAW
JURY TRIAL DEMAND



MOTION TO DISCONTINUE AS TO ALL PARTIES

1. This product liability and negligence case against Broderon Manufacturing Corporation and Carson Crane, Inc. was initiated in the Federal District Court for the Middle District of Pennsylvania.

2. A case management order was issued by the Honorable Yvette Kane requiring that the parties conduct factual discovery, and placing the matter upon the jury trial list for the Court's October term.

3. The parties have diligently conducted discovery, and learned through the discovery process that two other corporate entities may potentially be liable to the Plaintiff and to the original Defendants for contribution, Modern Equipment Company and Aycock, Inc.

4. These corporate entities have their principal places of business in Pennsylvania, and cannot be joined in this federal action without destroying diversity jurisdiction.

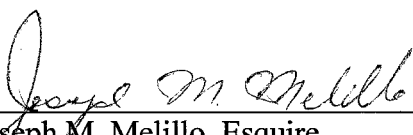
5. Plaintiff has initiated an additional action in Dauphin County Court of Common Pleas against these additional parties, and also named Broderon and Carson Crane as party Defendants.

6. Dismissing the pending federal case, without prejudice, is in the best interests of all parties and the court, and will not prejudice Broderon or Carson Crane.

WHEREFORE, Plaintiff requests that the Court dismiss the present action, without prejudice.

Respectfully submitted,

ANGINO & ROVNER, P.C.



Joseph M. Melillo, Esquire
Attorney I.D. No. 26211
4503 North Front Street
Harrisburg, PA 17110
(717) 238-6791
Attorney for Plaintiff

Date: April 9, 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LLOYD RAHN,

Plaintiff

NO. 1:01-CV-033

CHIEF JUDGE SYLVIA RAMBO

v.

BRODERSON MANUFACTURING
CORPORATION and CARSON
CRANE, INC.,

Defendants

CIVIL ACTION – LAW

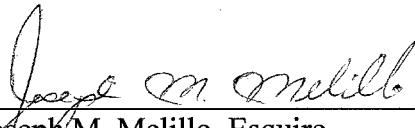
JURY TRIAL DEMANDED

CERTIFICATE OF PARTIAL NON-CONCURRENCE

I, Joseph M. Melillo, hereby certify that my office contacted counsel for Defendants, C. Kent Price, Esquire and Jefferson J. Shipman, Esquire, by telephone. Mr. Shipman, on behalf of Carson Crane, does not concur in Plaintiff's Motion for Discontinuance, and Mr. Price, on behalf of Broderon, is still considering its position.

Respectfully submitted,

ANGINO & ROVNER, P.C.



Joseph M. Melillo, Esquire

Attorney I.D. No. 26211

4503 North Front Street

Harrisburg, PA 17110

(717) 238-6791

Attorney for Plaintiff

Date: April 9, 2002

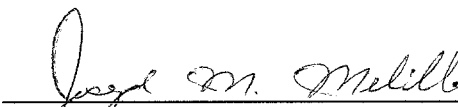
CERTIFICATE OF SERVICE

AND NOW, this 10th day of April, 2002, I, Joseph M. Melillo, Esquire, an employee of Angino & Rovner, P.C., and counsel for Plaintiff, do hereby certify that I have served a true and correct copy of the within Motion via United States mail, first class, postage prepaid at Harrisburg, Pennsylvania, addressed as follows:

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Joseph M. Melillo